

Bradley S. Schrager (Nevada Bar # 10217)

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

NEVADA STATE DEMOCRATIC PARTY,

Plaintiff,

v.

NEVADA REPUBLICAN PARTY, DONALD J. TRUMP FOR PRESIDENT, INC., ROGER J. STONE, JR., and STOP THE STEAL INC.,

Defendants.

Case No. 2:16-cv-02514-RFB-NJK

**DECLARATION OF
BRADLEY S. SCHRAGER, ESQ.**

I, Bradley S. Schrager, Esq., being of full age and upon my oath according to law, hereby declare as follows:

1. I am an Attorney-at-Law of the State of Nevada and Partner in the law firm of Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP, attorneys for Plaintiff, Nevada State Democratic Party, in the above-captioned matter. I am familiar with the facts related to this litigation.

2. Annexed hereto as Exhibit 1 is a true copy of the GOP Press Release (*RNC & Trump Campaign Announce Joint Agreements*) dated May 17, 2016.

3. Annexed hereto as Exhibit 2 is a true copy of the New York Times article (*Donald Trump's Call to Monitor Polls Raises Fears of Intimidation*) dated October 18, 2016.

4. Annexed hereto as Exhibit 3 is a true copy of the Volunteer to be a Trump Election Observer form.

5. Annexed hereto as Exhibit 4 is a true copy of the Guardian article (*Trump Loyalists Plan Own Exit Poll Amid Claims of 'Rigged' Election*) dated October 20, 2016.

6. Annexed hereto as Exhibit 5 is a true copy of the Stop the Steal website home page accessed October 22, 2016.

7. Annexed hereto as Exhibit 6 is a true copy of the Boston Globe article (*Warnings of Conspiracy Stoke Anger Among Trump Faithful*) dated October 15, 2016.

8. Annexed hereto as Exhibit 7 is a true copy of @jackbgoode1's tweet on August 19, 2016 at 7:43 P.M.

9. Annexed hereto as Exhibit 8 is a true copy of @jackbgoode1's tweet on July 14, 2016 at 9:14 A.M.

10. Annexed hereto as Exhibit 9 is a true copy of the Talking Points Memo article (*Why the RNC Wants Nothing to Do with Trump's Poll Watcher Call to Arms*) dated October 21, 2016.

11. Annexed hereto as Exhibit 10 is a true copy of the Hill article (*Trump Campaign Encouraging Surrogates To Double Down On Ballot Fraud*) dated October 21, 2016.

12. Annexed hereto as Exhibit 11 is a true copy of the Washington Post article (*Trump Fires up Recruitment of Poll Watchers as He Warns of Election 'Cheating'*) dated August 13, 2016.

13. Annexed hereto as Exhibit 12 is a true copy of the Washington Post article (*Pennsylvania Republicans Sue to Allow Poll Watchers to Cross County Lines*) dated October 22, 2016.

14. Annexed hereto as Exhibit 13 is a true copy of the CNN article (*Giuliani on Rigged Election: 'Dead People Generally Vote for Democrats'*) dated October 16, 2016.

15. Annexed hereto as Exhibit 14 is a true copy of the Face the Nation Transcript (*Face the Nation Transcript October 23, 2016: Priebus, Axelrod*) dated October 23, 2016.

16. Annexed hereto as Exhibit 15 is a true copy of the Order Granting Plaintiffs' Motion for Preliminary Injunction in *Brakebill v. Jaeger*, No. 16-cv-00008 (DLH), (D.N.D. Aug. 1, 2016).

17. Annexed hereto as Exhibit 16 is a true copy of the Washington Post article (*A Comprehensive Investigation of Voter Impersonation Finds 31 Credible Incidents Out of One Billion Ballots Cast*) dated August 6, 2014.

18. Annexed hereto as Exhibit 17 is a true copy of the Bloomberg Businessweek article (*Inside the Trump Bunker, with Days to Go*) dated October 27, 2016.

19. Annexed hereto as Exhibit 18 is a true copy of the Politico article (*Trump: Without ID Law, Voters Will Vote '15 Times' for Clinton*) dated August 9, 2016.

20. Annexed hereto as Exhibit 19 is a true copy of the Politico article (*How Hostile Poll-Watchers Could Hand Pennsylvania to Trump*) dated October 2, 2016.

21. Annexed hereto as Exhibit 20 is a true copy of the Atlantic article (*Donald Trump's Attacks on the Rights of Minority Voters*) dated October 13, 2016.

22. Annexed hereto as Exhibit 21 is a true copy of the Boston Globe article (*Giuliani, Gingrich Raise Specter of Voter Fraud Ahead of Election*) dated October 16, 2016.

23. Annexed hereto as Exhibit 22 is a true copy of the Hill article (*Trump: Government Bringing in Illegal Immigrants to Vote*) dated October 7, 2016.
24. Annexed hereto as Exhibit 23 is a true copy of the RealClearPolitics Transcript (*CNN's Jake Tapper vs. Rudy Giuliani: You're Saying Only Democrats Rig Elections?*) dated October 16, 2016.
25. Annexed hereto as Exhibit 24 is a true copy of the RealClearPolitics Transcript (*Gingrich: 20 Media Executives Are Launching a "Coup D'Etat" Against Millions of Trump Voters*) dated October 16, 2016.
26. Annexed hereto as Exhibit 25 is a true copy of Twitter user @roycan79's tweet on October 17, 2016 at 9:53 a.m.
27. Annexed hereto as Exhibit 26 is a true copy of Twitter user @soniafarace's tweet on October 11, 2016 at 4:44 p.m.
28. Annexed hereto as Exhibit 27 is a true copy of the StopTheSteal.org "Voter Protector Exit Poller" registration form.
29. Annexed hereto as Exhibit 28 is a true copy of the Washington Post article (*Poll: Nearly Half of Americans Say Voter Fraud Occurs Often*) dated September 15, 2016.
30. Annexed hereto as Exhibit 29 is a true copy of the Breitbart article (*Wikileaks: John Podesta Believed 'Obama Forces' Committed Voter Fraud*) dated October 15, 2016.
31. Annexed hereto as Exhibit 30 is a true copy of the New Yorker article (*The Dirty Trickster*) dated June 2, 2008.
32. Annexed hereto as Exhibit 31 is a true copy of the BillyPenn.com article ('*Rigged?' Western PA Republican Circulates Fake Meme About Online Voting in PA*) dated October 18, 2016.

33. Annexed hereto as Exhibit 32 is a true copy of the “Defend the Donald” website, accessed October 29, 2016.

34. Annexed hereto as Exhibit 33 is a true copy of @Lady_Lbry’s tweet on October 26, 2016 at 9:28 P.M.

35. Attached hereto as Exhibit 34 is a true copy of @StoneColdTruth’s tweet on October 23, 2016, at 5:12 P.M.

36. Annexed hereto as Exhibit 35 is a true copy of @RalstonReports’ tweet and accompanying images from October 28, 2016, at 2:30 P.M.

37. Attached hereto as Exhibit 36 is a true copy of the Huffington Post article (*Trump-Linked Voter Intimidation Group Releases New Script for ‘Citizen Journalists’*) dated October 26, 2016).

38. Attached hereto as Exhibit 37 is a true copy of the Complaint filed in *Daschle v. Thune*, No. 04-cv-4177 (D.S.D. Nov. 1, 2004).

39. Attached hereto as Exhibit 38 is a true copy of the Temporary Restraining Order issued by the court in *Daschle v. Thune*, No. 04-cv-4177 (D.S.D. Nov. 2, 2004).

40. Attached hereto as Exhibit 39 is a true copy of @RalstonReports’ tweet from October 28, 2016, at 5:11 P.M.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Bradley S. Schrager

Bradley S. Schrager, Esq.

Dated: November 1, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of November, 2016 a true and correct copy of **DECLARATION OF BRADLEY S. SCHRAGER, ESQ.** was served via the United States District Court CM/ECF system on all parties or persons requiring notice, and having access to the electronic filing system referenced.

By: /s/ Danielle Fresquez
Danielle Fresquez, an Employee of
WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP